

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff

v.

ALEXANDER JONES, et al.,

Defendants

CASE NO.: 3:18-cv-00017-NKM-JCH

**ANSWER TO AMENDED
COMPLAINT (DKT. 29) FILED BY
DEFENDANT STRANAHAN**

NOW COMES Defendant Stranahan, by his counsel Aaron J. Walker, Esq., in the above-styled case for the sole purpose of filing this Answer, without waiving any rights of jurisdiction, notice, process, joinder, or venue. In Answer to the First Amended Complaint (“FAC”) he states the following.

All allegations are to be considered denied unless specifically admitted to.

Several paragraphs are unnumbered; this Answer will identify such paragraphs by the page on which these paragraphs start (even if they end on a different page) and the first few words of that paragraph.

The following terms and abbreviations are used throughout this Answer:

“WNI” means Words-N-Ideas, LLC

“WNI Defendants” means WNI, Wilburn, and Hickford, collectively.

“Third party” and “third parties” refers to persons other than Mr. Stranahan, including current and former co-defendants and individuals not named as defendants, unless otherwise stated.

GENERALLY APPLICABLE DENIALS

Because of the length and complexity of the FAC, there is a danger that Mr. Stranahan might, by inadvertency, appear to admit to something he in reality denies. Therefore, Mr. Stranahan makes the following blanket denials, which supersedes any inadvertent admissions in this document:

- Mr. Stranahan denies making any false or defamatory statement of or concerning the Plaintiff.
- Mr. Stranahan denies making any false or defamatory implication of or concerning the Plaintiff.
- Mr. Stranahan denies any legal responsibility for the wrongful conduct of any third party or parties.
- Mr. Stranahan denies inciting violence or wrongful conduct of any third party or parties.

If any statement in the remainder of this Answer appears to contradict those generally applicable denials, these generally applicable denials control.

RESPONSES TO INITIAL UNNUMBERED PARAGRAPHS

In the first unnumbered paragraph on page 1, which starts with the words “NOW COMES...” This is not a statement that requires a response.

In the second unnumbered paragraph on page 1, which starts with the words “Brennan Gilmore works...” Mr. Stranahan denies the following portion of this paragraph to the extent that they are allegations against him:

Supporters of the alt-right and the “Unite the Right” rally, including the Defendants, created a new identity for Mr. Gilmore—the organizer and orchestrator of Fields’

attack and a traitor to the United States. Defendants' lies about Mr. Gilmore quickly mobilized their armies of followers to launch a campaign of harassment and threats against Mr. Gilmore that continue to this day.

To the extent that this passage makes accusations against third parties Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations sufficient to either admit or deny them, and he similarly lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

In the first unnumbered paragraph on page 2, which starts with the words "Supporters of the..." To the extent that these allegations are against Mr. Stranahan, they are denied, and to the extent that this paragraph makes accusations against third parties, Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations sufficient to either admit or deny them.

In the second unnumbered paragraph on page 2, which starts with the words "Defendants thrive by..." Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the following portion of this paragraph sufficient to either admit or deny the allegations contained therein:

A list of Mr. Gilmore and his parents' known addresses was posted online, prompting local law enforcement to patrol his parents' home. Mr. Gilmore suffered from an overwhelming volume of hate mail and death threats, hacking attempts, and even in-person harassment on the streets of Charlottesville.

The remaining allegations in that paragraph are denied, to the extent that these allegations are against Mr. Stranahan. To the extent that the remaining allegations in this paragraph are against third parties Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations sufficient to either admit or deny them.

In the first unnumbered paragraph on page 3, which starts with the words “To this day...” To the extent that these allegations are against Mr. Stranahan, they are denied. To the extent that these allegations are against third parties, Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations sufficient to either admit or deny them.

In the second unnumbered paragraph on page 3, which starts with the words “Fact-based journalism...” Much of the paragraph contains statements of philosophy and law to which no response is necessary. To the extent that the paragraph contains allegations against Mr. Stranahan, they are denied. To the extent that it contains allegations against third parties, Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations sufficient to either admit or deny them.

In the third unnumbered paragraph on page 3, which starts with the words “Brennan Gilmore told...” With respect to the claim the Plaintiff told the truth, Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of that allegation sufficient to either admit or deny it. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

RESPONSES TO NUMBERED PARAGRAPHS

1. Mr. Stranahan admits that this case arises under Virginia law. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

2. This is not a statement that requires a response.

3. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

4. Mr. Stranahan admits he is subject to personal jurisdiction in Virginia. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

5. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

6. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

7. Mr. Stranahan admits he has engaged in a persistent course of conduct in Virginia as he is domiciled in that state. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

8. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

9. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

10. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

11. Mr. Stranahan admits he covered events related to the “Unite the Right” rally more than once and covered it as a journalistic endeavor. He denies that he has “gone further to purposefully avail [himself] of Virginia, where [he] carried out a plan to report on and cover prominently the ‘Unite the Right’ rally in Virginia.” Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

12. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

13. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

14. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

15. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

16. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

17. Mr. Stranahan denies that he is domiciled in Texas; denies that as a legally blind man, he has a Texas driver’s license; and denies that he is actively registered to vote in Texas. He

admits that he was featured in a video that was posted by InfoWars on August 15, 2017, he admits that he is a former employee of the company that owns the website Breitbart News. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

18. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

19. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

20. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

21. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them, except that he admits that Allen West represented the Florida's 22nd congressional district in the United States House of Representatives.

22. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

23. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

24. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

25. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

26. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

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35. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

36. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

37. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

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43. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

44. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

45. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the factual allegations in this paragraph sufficient to either admit or deny them.

46. Mr. Stranahan lack knowledge or information sufficient to form a belief about the truth of the factual allegations in this paragraph sufficient to either admit or deny them.

47. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the factual allegations in this paragraph sufficient to either admit or deny them.

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57. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

58. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

59. Mr. Stranahan denies the allegation that George Soros is a philanthropist. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

60. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

61. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

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79. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

80. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

81. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

82. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

83. The statement “Because the video goes on to describe Mr. Gilmore and his alleged connection to Ukraine and Soros, the factual allegation that he is one of the ‘same players [. . .] working behind the scenes to oust President Trump.’” is a sentence fragment, and therefore it cannot be responded to. The following line “This is false” is rendered vague by the fragmentary nature of the prior sentence. To the extent that this paragraph describes the contents of a video-recorded interview, the video speaks for itself and Mr. Stranahan denies the Plaintiff’s characterization of it. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

84. To the extent that this paragraph describes the contents of a video-recorded interview, the video speaks for itself and Mr. Stranahan denies the Plaintiff’s characterization of it. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

85. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

86. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

87. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

88. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

89. Mr. Stranahan admits that he believes that most people understand the clear meaning of his words and body language. To the extent that this paragraph describes the contents of a video-recorded interview, the video speaks for itself and Mr. Stranahan denies the Plaintiff's characterization of it. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

90. Mr. Stranahan admits he is a fact-based journalist and has told others that he is one. To the extent that this paragraph describes the contents of a video-recorded interview, the video speaks for itself and Mr. Stranahan denies the Plaintiff's characterization of it. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

91. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

92. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

93. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

94. Mr. Stranahan admits that he never contacted Mr. Gilmore or any of the other individuals or organizations named in a video for comment or confirmation of the facts he alleged. With respect to the remaining allegations in this paragraph against Mr. Stranahan, they are denied. With respect to the allegations against third parties, Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

95. To the extent that this paragraph describes the contents of a video-recorded interview, the video speaks for itself and Mr. Stranahan denies the Plaintiff's characterization of it. To the extent that the remaining allegations in this paragraph concern Mr. Stranahan, they are denied. To the extent that this paragraph makes allegations about third parties, Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

96. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

97. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

98. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

99. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

100. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

101. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

102. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

103. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

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106. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

107. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

108. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

109. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

110. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

111. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

112. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

113. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

114. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

115. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

116. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

117. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

118. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

119. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

120. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

121. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

122. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

123. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

124. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

125. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

126. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

127. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

128. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

129. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

130. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

131. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

132. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

133. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

134. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

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136. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

137. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

138. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

139. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

140. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

141. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

142. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

143. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

144. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

145. Mr. Stranahan denies the following statement, to the extent it is an accusation against him: “Their paranoid fantasies have no basis whatsoever in fact and are demonstrably false[.]” Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

146. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

147. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

148. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

149. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

150. Mr. Stranahan denies that he is the legal cause of any misconduct by any third party. This denial applies every time the allegation is repeated. Mr. Stranahan denies the remaining allegations in this paragraph.

151. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

152. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

153. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

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155. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

156. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

157. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

158. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

159. Mr. Stranahan lacks denies that any defamation, let alone a defamatory campaign, occurred. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

160. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

161. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

162. Mr. Stranahan denies that he has lied about the Plaintiff. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

163. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

164. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

165. Mr. Stranahan understands these allegations to be solely against Jones and InfoWars, and therefore, Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

166. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

167. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

168. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

169. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

170. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

171. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

172. Mr. Stranahan denies making any false statements about non-party Chobani, LLC. To the extent that this paragraph describes the contents of an article, the article speaks for itself and Mr. Stranahan denies the Plaintiff's characterization of it. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

173. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

174. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

175. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

176. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

177. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

178. Mr. Stranahan denies telling any lie about the Plaintiff, denies he has punished the Plaintiff, and denies making any false or defamatory statements or implications about the Plaintiff. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

179. To the extent that this paragraph describes the contents of an article, the article speaks for itself and Mr. Stranahan denies the Plaintiff's characterization of it. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

180. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegation that the Plaintiff "lives in constant, ongoing fear of vile online and in-person harassment of himself and his family" sufficient to either admit or deny this allegation. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them

181. The term "ongoing distress" is unclear because it is uncertain whether the FAC refers to distress allegedly caused by Mr. Stranahan or third parties not named as defendants. Accordingly, Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of all of the allegations in this paragraph sufficient to either admit or deny them.

182. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegation that the Plaintiff's "physical condition makes it difficult and sometimes impossible for him to work and conduct regular, daily activities" sufficient to either admit or deny this allegation. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

183. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegation that the Plaintiff's "depressive symptoms, including irritability, difficulty concentrating, and loss of sleep, have significantly impaired his ability to perform work responsibilities and attend social events" sufficient to either admit or deny this allegation. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

184. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegation that the Plaintiff "now limits his social engagements or going out in public, as he fears engaging with people who he does not already know and trust, and engages less on social media" sufficient to either admit or deny this allegation. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

185. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegation that "[a]t least one potential romantic partner cut off contact with Mr. Gilmore because of Defendants' statements" sufficient to either admit or deny this allegation. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

186. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

187. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them, except he denies making any false statements about the Plaintiff.

188. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

189. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

190. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

191. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

192. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

193. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

194. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

195. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

196. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

197. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

198. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

199. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

200. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

201. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

202. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

203. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

204. No response is necessary to this paragraph.

205. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

206. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

207. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

208. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

209. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

210. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

211. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

212. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

213. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

214. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

215. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

216. No response is necessary to this paragraph.

217. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

218. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

219. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

220. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

221. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

222. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

223. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

224. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

225. No response is necessary to this paragraph.

226. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

227. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

228. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

229. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

230. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

231. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

232. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

233. No response is necessary to this paragraph.

234. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

235. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

236. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

237. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

238. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

239. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

240. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

241. No response is necessary to this paragraph.

242. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

243. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny what the state of mind of any third party was. To the extent that the remaining allegations in this paragraph apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them

244. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

245. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

246. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

247. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

248. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

249. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

250. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

251. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

252. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

253. Denied.

254. Denied.

255. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

256. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

257. To the extent that these allegations apply to Mr. Stranahan, they are denied. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the remaining allegations in this paragraph sufficient to either admit or deny them.

258. No response is necessary to this paragraph.

259. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

260. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

261. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

262. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

263. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

264. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

265. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

266. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

267. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

268. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

269. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

270. No response is necessary to this paragraph.

271. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

272. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

273. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

274. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

275. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

276. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

277. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

278. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

279. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

280. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

281. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

282. Mr. Stranahan lacks knowledge or information sufficient to form a belief about the truth of the allegations in this paragraph sufficient to either admit or deny them.

No further responses are necessary because the remainder of the FAC either 1) relate to the count for intentional infliction of emotional distress, which was dismissed, or 2) relate to a prayer for relief that requires no response.

AFFIRMATIVE DEFENSES

The statement of any defense contained herein does not assume the burden of proof for any issue for which the applicable law places the burden on Plaintiff.

1. The FAC fails to state a cause of action upon which relief may be granted.
2. The statements at issue are not of and concerning Plaintiff.
3. The statements at issue are immune from liability under the fair reporting privilege.
4. The statements at issue are not capable of defamatory meaning.
5. The statements at issue are not defamatory per se.

6. Plaintiff is a public official, or alternatively a public figure or a limited-purpose public figure for purposes of the statements alleged, and Plaintiff cannot establish by clear and convincing evidence that the Free Speech Defendants acted with actual malice.

7. The statements at issue were about matters of public concern.

8. The statements at issue are privileged because the subject matter was of public concern and affected a substantial interest of the public.

9. The statements at issue constitute opinion or fair comment and are non-actionable.

10. Plaintiff as a public figure has assumed the risk of being subject to the statements at issue.

11. Plaintiff consented to the publications by voluntarily injecting himself into a public controversy, through his use of social media, and by making statements on national television.

12. Plaintiff has failed to mitigate any damages he has incurred.

13. Plaintiff is barred from recovery for damages caused by the acts of others.

14. The Complaint fails to state a cause of action for punitive damages.

15. An award of punitive damages would violate the First Amendment of the United States Constitution.

16. Mr. Stranahan is entitled to dismissal and a cost and fee award under Virginia's anti-SLAPP statute, Va. Code § 8.01-223.2.

17. This Court lacks subject matter jurisdiction because the parties are not truly diverse and there is an insufficient amount in controversy.

18. The statements at issue are true or substantially true and do not have any false implications.

19. The statements at issue are protected opinion.

20. The First Amendment protects the statements that were made, as do comparable portions of the Virginia Constitution, e.g. VA CONST. Art. I, §§ 2 and 12.

21. Mr. Stranahan is not the legal cause of any damages alleged by the Plaintiff.

22. Other parties are responsible for any tortious conduct alleged in this suit.

23. Comparative fault of third parties.

24. Failure to join a party under Rule 19.

25. Wrong party or persons sued.

Friday, April 26, 2019

Respectfully submitted,

s/ Aaron J. Walker
Aaron J. Walker, Esq.
Attorney for Lee Stranahan
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Manassas, Virginia 20109
(703) 216-0455
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Western District of Virginia on May 10, 2019. Participants in the case who are registered for electronic filing will be served automatically.

s/ Aaron J. Walker